Remarks

Applicants respectfully request reconsideration of this application as amended. Claims 1, 4, 7, 9, 13, 15 and 19 have been amended. Claims 10 and 17 have been cancelled. Therefore, claims 1-16 and 18-29 are presented for examination.

Claims 9-10 and 13-14 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Claims 4 and 14 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants submit that the claims have been amended to appear in proper condition for allowance.

Claims 1, 7, 23 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tremaine (U.S. Patent No. 6,775,751) in view of Goldberg (U.S. Patent No. 7,035,656). Applicants submit that the present claims are patentable over Tremaine in view of Goldberg.

Tremaine discloses a method and structure for reducing access latency and contention in a processing. The method detects when the amount of available memory is outside a prescribed range, and responsively selects data blocks for compression (to add to the available memory,) or decompression (to use surplus available memory for uncompressed data,) until the amount of available memory is within the prescribed range. When data blocks are compressed, a DOC is determined and stored as an attribute in the directory entry associated with the data block. A most recently used list of recent data block addresses prevents those, as well those data blocks with poor DOC attributes, from being selected for recompression. All zero data blocks are detected to avoid standard compression/decompression overhead. See Tremaine at Abstract.

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Goldberg discloses a network controller for controlling a message over a communication network constantly monitors actually transmitted message from or to a particular user. If the controller determines a particular phrase is transmitted more than a predetermined number of times, the controller updates support data and transmits the data in a compressed format with support data. The network controller may send an updated support data in response to a request from user equipment. See Goldberg at Abstract.

Claim 1 of the present application recites a compressed data block having compressed symbols and dictionary elements having a fixed length and a fixed offset within the compressed data block. Applicants submit that nowhere in Tremaine or Goldberg is there disclosed or suggested compressed symbols and dictionary elements having a fixed length and fixed offset within a compressed data block. Particularly, Tremaine doesn't disclose or suggest a compression format for compressed blocks. Instead, Tremaine discloses a compressed memory translation table used to control compression and decompression.

Since neither Tremaine nor Goldberg disclose or suggest compressed symbols and dictionary elements having a fixed length and fixed offset within a compressed data block, any combination of Tremaine and Goldberg would not disclose or suggest such a feature. Accordingly, claim 1, and its dependent claims, is patentable over Tremaine in view of Goldberg.

Independent claims 7, 23 and 26 include limitations similar to those recited in claim 1. Thus, claims 7, 23 and 26, and their respective dependent claims, are patentable over Tremaine in view of Goldberg.

Claims 2-6, 8-12, 24 and 27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tremaine and Goldberg and further in view of Castelli et al. (U.S. Patent

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No. 6,847,315). Applicants submit that the present claims are patentable over Tremaine in view of Goldberg even in view of Castelli.

Castelli discloses a method and structure that stores and/or transmits and receives data in compressed form. Retrieval latencies are reduced by selectively transmitting a portion of the data in uncompressed form. When the apparatus is part of a computer architecture supporting main memory compression, a selected L2 cache line belonging to the unit of main memory compression is kept uncompressed. To minimize decompression latency, the uncompressed L2 cache line is stored with the compressed-memory directory. Alternatively, the uncompressed L2 cache line is stored in the compressed memory together with the rest of the memory compression unit it belongs to. See Castelli at Abstract.

Nevertheless, Castelli does not disclose or suggest compressed symbols and dictionary elements having a fixed length and fixed offset within a compressed data block. As discussed above, Tremaine and Goldberg does not disclose compressed symbols and dictionary elements having a fixed length and fixed offset within a compressed data block. Therefore, any combination of Tremaine, Goldberg and Castelli would not disclose or suggest such a feature. Thus, the present claims are patentable over Tremaine in view of Goldberg and Castelli.

Claims 13-14 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tremaine, Goldberg, and Castelli et al., as applied to claims 8 and 24 above, and further in view of Franaszek et al. (U.S. Patent No. 5,729,228).

Claims 15-17, 19, and 28-29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Franaszek et al. in view of Goldberg. Applicants submit that the present claims are patentable over Franaszek in view of Goldberg.

Franaszek discloses a method and apparatus for compressing a block of data using a shared dictionary. Data to be compressed is divided into subblocks which are each provided to a respective compressor in a plurality of compressors. The compressors cooperatively construct a dynamic compression dictionary and compress the subblocks in parallel using the dictionary. Compressed subblocks output by the compressors are concatenated to form a compressed block. See Franaszek at Abstract. The subblocks are then decompressed in parallel (col. 3, ll. 16-20).

Claim 15 of the present application recites decompressing each of compressed symbol of a compressed data block in parallel. Applicants submit that neither Franaszek nor Goldberg disclose or suggest decompressing each compressed symbol in a compressed block in parallel. Franaszek discloses subdividing a block into subblocks and decompressing each subblock in parallel. However, there is no disclosure, or reasonable suggestion, of decompressing *each symbol* within a subblock in parallel.

Moreover, Franaszek does not disclose the compressed data blocks as having fixed offsets. Franaszek explicitly discloses that because the degree of compression is variable, depending on the data, each compressed sub-block will in general be a different size. Franaszek at col. 2, ll. 59-61. Thus, the compressed blocks cannot have a fixed offset. For the above reasons the combination of Franaszek and Goldberg doe not disclose or suggest all of the limitations of claim 15, or its dependent claims.

Independent claim 19 includes limitations similar to those recited in claim 15. Thus, claim 19, and its dependent claims, are also patentable over Franaszek in view of Goldberg.

Claims 18 and 20-22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Franaszek in view of Goldberg, and further in view of Castelli et al. (U.S. Patent No.

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6,847,315). Applicants submit that any combination of Franaszek, Goldberg and Castelli would fail to disclose or suggest decompressing each symbol within a compressed block in parallel, or the compressed blocks having a fixed offset. Therefore, the present claims are patentable over the combination of Franaszek, Goldberg and Castelli

Applicants respectfully submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 5/18/07

Mark L. Watson
Reg. No. 46,322

12400 Wilshire Boulevard
7th Floor
Los Angeles, California 90025-1026
(303) 740-1980

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